

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RECEIVED

DEC 12 1994

FEDERAL COMMUNICATIONS COMMISSION
DIVISION OF TELECOMMUNICATIONS

In the Matter of)
) RM-8535
Provision of Access for)
900 Number Services)

NYNEX REPLY COMMENTS

The NYNEX Telephone Companies ("NYNEX") hereby submit these
Reply Comments in the above-captioned matter.

The Teleservices Industry Association ("TIA") has requested that the
Commission institute a rulemaking proceeding to investigate the feasibility of
implementing number portability for 900 access service.¹ TIA assumes that
900 number portability can be easily accommodated by simple software
changes to the current 800 database system. TIA thus contends that the costs
of implementing 900 number portability "should be relatively minimal."² The
comments filed in this proceeding clearly demonstrate that TIA is wrong.

¹ Currently, 900 access service is provided through an "NXX" screening system. Under this system, each interexchange carrier is assigned specific NXX codes by Bellcore. When a call is made to a 900 number, the originating LEC screens the first six digits of the call, identifies the IC to whom the NXX is assigned, and routes the call to that IC. A 900 service provider cannot switch carriers without changing its 900 number. Thus, the 900 numbers are not portable.

² TIA Petition at 15.

No. of Copies rec'd
List A B C D E

005
CEB

It will be neither easy nor inexpensive to implement 900 number portability. As pointed out by US West in its Comments,³ in order to provide 900 number portability using the current 800 database technology, extensive changes would have to be made to the Service Management System ("SMS") software and the SMS computer hardware; the systems interfacing with the SMS; the software controlling individual 800 data bases; and the switch software which generates queries to the 800 databases. It is also not possible, at this time, to provide nationwide 900 number portability through the use of Advanced Intelligent Network (AIN) technology. It will be at least several years before all end offices throughout the country will be AIN-equipped or have access to an AIN-equipped tandem.⁴

As several parties pointed out, either solution will be costly to implement.⁵ In view of the fact that the demand for 900 services is declining,⁶ NYNEX is concerned that it will not be able to recover its costs of implementing 900 number portability and will be left with stranded investment. Under the circumstances, any rulemaking proceeding initiated by

³ U S West Comments at 3.

⁴ BellSouth Comments at 3. NYNEX plans to begin deploying AIN technology in its network in 1995.

⁵ Ameritech Comments at 1; Sprint Comments at 4 n. 1.

⁶ In the NYNEX region, the originating minutes of use for 900 services has declined from almost 53 million in 1991 to an estimated 35 million in 1994.

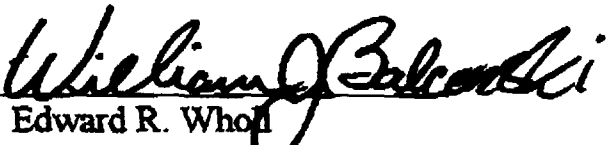
the Commission must include consideration of the manner in which the LECs would be permitted to recover the costs they reasonably incur to implement 900 portability.

Even if 900 number portability is deemed desirable in the near term, the Commission should not initiate a rulemaking proceeding until industry consensus is reached as to whether and how such portability should be accomplished. The Commission should thus refer this issue to industry policymaking bodies (as it has already done in the case of 500 number portability) and refrain from expending scarce regulatory resources on the specifics of implementation.

WHEREFORE, for the reasons discussed herein, NYNEX respectfully submits that TIA's Petition for Rulemaking should be denied.

Respectfully submitted,

The NYNEX Telephone Companies

By: 
Edward R. Wholl
William J. Balcerak

120 Bloomingdale Road
White Plains, N.Y. 10605
(914) 644-2032

Their Attorneys

Dated: December 12, 1994
RM8535.doc

CERTIFICATE OF SERVICE

I certify that copies of the foregoing REPLY COMMENTS were served on each of the parties listed on the attached Service List, this 12th day of December, 1994, by first class United States mail, postage prepaid.


Bernadette Chawke

Edwin D. Lavergne
Rodney L. Joyce
Ginsburg, Feldman and Bress Chartered
Attorneys for The Teleservices Industry
Association
1250 Connecticut Avenue, NW
Washington, D.C. 20036

Robert M. Lynch
Richard C. Hartgrove
J. Paul Walters, Jr.
Attorneys for Southwestern Bell Telephone
Company
One Bell Center, Room 3520
St. Louis, Missouri 63101

James P. Tuthill
Theresa L. Cabral
Pacific Bell
140 New Montgomery Street, Room 1529
San Francisco, CA 94105

Michael S. Pabian
Attorneys for Ameritech
Room 4H76
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

Edward W. Hummers, Jr.
Charles H. Kennedy
Fletcher, Heald & Hildreth, P.L.C.
Attorneys for Network Telephone
Services, Inc.
1300 North 17th Street, 11th Floor
Rosslyn, Virginia, 22209

Debora J. Wilson
Senior Vice President
The Weather Channel, Inc.
2600 Cumberland Parkway
Atlanta, GA 30339

Gregory F. Intoccia
Donald J. Elardo
MCI Telecommunications Corporation
1801 Pennsylvania Ave., NW
Washington, D.C. 20006

Leon M. Kestenbaum
Jay C. Keithley
Marybeth M. Banks
Sprint Corporation
1850 M Street, N.W., Suite 1110
Washington, D.C. 20036

M. Robert Sutherland
Richard M. Sbaratta
Helen A. Shockey
Bellsouth Telecommunications, Inc.
4300 Southern Bell Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

Jeffrey S. Bork
U S West Communications, Inc.
1020 19th Street, N.W., Suite 700
Washington, D.C. 20036